

Certified Mail No.

Agency Interest (AI) No. 151188  
Activity No. PER20070003

Mr. David Goodwin  
Vice President Compliance & Operations Services  
Gulf Crossing Pipeline Company, LLC  
9 Greenway Plaza, Suite 2800  
Houston, Texas 77046

RE: Prevention of Significant Deterioration (PSD) Permit, PSD-LA-729  
Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station  
Gulf Crossing Pipeline Company, LLC, Sterlington, Ouachita Parish, Louisiana

Dear Mr. Goodwin:

Enclosed is your permit, PSD-LA-729. Construction of the proposed project is not allowed until such time as the corresponding Part 70 Operating Permit is issued.

Should you have any questions, contact Mr. Scott B. Pierce of the Air Permits Division at (225) 219-3181.

Sincerely,

Cheryl Sonnier Nolan.  
Assistant Secretary

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Date

CSN:sbp

c: US EPA Region VI

Agency Interest No. 151188

PSD-LA-729

**AUTHORIZATION TO CONSTRUCT AND OPERATE A NEW FACILITY  
PURSUANT TO THE PREVENTION OF SIGNIFICANT DETERIORATION  
REGULATIONS IN LOUISIANA ENVIRONMENTAL REGULATORY CODE,  
LAC 33:III.509**

In accordance with the provisions of the Louisiana Environmental Regulatory Code, LAC 33:III.509,

Gulf Crossing Pipeline Company, LLC  
9 Greenway Plaza, Suite 2800  
Houston, Texas 77046

is authorized to construct the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station near

1476 Keystone Road  
Sterlington, Ouachita Parish, Louisiana

subject to the emissions limitations, monitoring requirements, and other conditions set forth hereinafter.

This permit and authorization to construct shall expire at midnight on \_\_\_\_\_, 2010, unless physical on site construction has begun by such date, or binding agreements or contractual obligations to undertake a program of construction of the source are entered into by such date.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Cheryl Sonnier Nolan  
Assistant Secretary  
Office of Environmental Services  
Louisiana Department of Environmental Quality

## **BRIEFING SHEET**

### **Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**

**Agency Interest No.: 151188**

**Gulf Crossing Pipeline Co LLC**

**Sterlington, Ouachita Parish, Louisiana**

**PSD-LA-729**

### **PURPOSE**

Construct a natural gas transmission station. Gulf Crossing Pipeline Company, LLC, a subsidiary of Boardwalk Pipelines Partnerships, LP, will develop the project.

### **RECOMMENDATION**

Approval of the proposed construction and issuance of a permit.

### **REVIEWING AGENCY**

Louisiana Department of Environmental Quality, Office of Environmental Services, Air Permits Division

### **PROJECT DESCRIPTION**

Natural gas will be transported to the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station via pipeline. To provide for more efficient transportation (compression) of the gas, condensate will be separated from the natural gas and stored in a 100 barrel storage tank and periodically loaded into a tank truck and shipped off-site. Two natural gas-fired compressor turbines rated at 10,311 horsepower each, and one compressor engine equipped with oxidation catalyst controls and rated at 4,735 horsepower will be used to transport the natural gas by pipeline from the compressor station to commerce. Air emissions will consist primarily of combustion products generated from firing natural gas in the turbines and reciprocating engine. Volatile organic compounds will be generated during loading operations from the condensate tank to tank trucks, flashing at the condensate tank, the blowdown vent, area releases of natural gas from possible miscellaneous engine/compressor vents and/or gas controlled valve operators, and fugitive emissions from equipment components. Additionally, minimal fugitive particulate emission will be generated by traveling on unpaved roads. The facility will also consist of a natural gas-fired emergency use backup generator engine rated at 838 horsepower.

The compressor station will be built on property adjacent to Gulf South Pipeline Company, LP's existing Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) permitted under permit no. 2160-00046-V1, issued August 11, 2006. The two compressor stations are contiguous facilities. The estimated emissions for NO<sub>x</sub> and CO from the contiguous Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) are 642.77 tpy and 999.87 tpy respectively which are above the PSD Major Source Levels (250 tpy). Therefore, the proposed Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station is considered a major stationary source in accordance with LAC 33:III.509. Any NSR regulated pollutants emitted above the *de minimis* levels as a result of the proposed construction project will be subject to a PSD review.

## BRIEFING SHEET

### Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station

Agency Interest No.: 151188

Gulf Crossing Pipeline Co LLC  
Sterlington, Ouachita Parish, Louisiana  
PSD-LA-729

Estimated emissions, in tons per year, are as follows:

<u>Pollutant</u>	<u>Emissions</u>	<u>PSD de minimis</u>	<u>Review required?</u>
PM	6.48	25	No
PM <sub>10</sub>	6.48	15	No
SO <sub>2</sub>	2.44	40	No
NO <sub>x</sub>	72.65	40	Yes
CO	47.69	100	No
VOC	64.79	40	Yes

### TYPE OF REVIEW

Nitrogen oxide (NO<sub>x</sub>) and volatile organic compound (VOC) emissions from the proposed facility will be above PSD significance levels. Therefore, the requested permit was reviewed in accordance with PSD regulations for NO<sub>x</sub> and VOC emissions. Emissions of LAC 33:III.Chapter 51-regulated toxic air pollutants (TAP) have been reviewed pursuant to the requirements of the Louisiana Air Quality Regulations.

### BEST AVAILABLE CONTROL TECHNOLOGY

NO<sub>x</sub> and VOC emissions are above PSD significance levels and must undergo PSD analyses. The selection of control technology was based on the BACT analysis using a "top down" approach and did not include consideration of control of toxic materials.

All PSD applications must include an emission control technology analysis consistent with federal regulations. The BACT requirements are intended to ensure that a proposed facility will incorporate emission control systems that are consistent with those being utilized on similar projects throughout the United States. The top down approach used in this analysis involves determining the most stringent control available for a similar or identical emission source.

### AIR QUALITY IMPACT ANALYSIS

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed facility.

AERMOD modeling indicates maximum ground level concentrations of NO<sub>x</sub> are below the ambient significance levels and preconstruction monitoring exemption levels. Therefore, no preconstruction monitoring, increment analysis, or refined modeling is required for these pollutants.

**BRIEFING SHEET****Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station****Agency Interest No.: 151188****Gulf Crossing Pipeline Co LLC****Sterlington, Ouachita Parish, Louisiana****PSD-LA-729****ADDITIONAL IMPACTS**

Soils, vegetation, and visibility will not be adversely impacted by the proposed facility, nor will any Class I area be affected. The project will not result in any significant secondary growth effects. Approximately 2 new permanent jobs will be created.

**PROCESSING TIME**

Application Dated:	October 3, 2007
Application Received:	October 5, 2007
Additional Information Dated:	March 26, 2008 (consolidated and certified previous submittals)
Effective Completeness Date:	March 31, 2008

**PUBLIC NOTICE**

A notice requesting public comment on the proposed project was published in *The Advocate*, Baton Rouge, Louisiana, on <<Date>>, 200x; and in <<Local Paper>>, <<City>>, Louisiana, on <<Date>>, 200x. Copies of the public notice were also mailed to individuals who have requested to be placed on the mailing list maintained by the Office of Environmental Services on <<Date>>, 200x. A proposed permit was also submitted to U.S. EPA Region VI on <<Date>>, 200x. All comments will be considered prior to a final permit decision.

## **PRELIMINARY DETERMINATION SUMMARY**

### **Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**

**Agency Interest No.: 151188**

**Gulf Crossing Pipeline Co LLC**

**Sterlington, Ouachita Parish, Louisiana**

**PSD-LA-729**

**March 31, 2008**

#### **I. APPLICANT**

Gulf Crossing Pipeline Company, LLC  
9 Greenway Plaza, Suite 2800  
Houston, Texas 77046

#### **II. LOCATION**

Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station will be located on Keystone Road, adjacent to Gulf South Pipeline Co - Sterlington Compressor Station located at 1476 Keystone Rd, Sterlington, Louisiana. Approximate UTM coordinates are 642.117 kilometers East, 3595.74 kilometers North, Zone 15

#### **III. PROJECT DESCRIPTION**

Natural gas will be transported to the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station via pipeline. To provide for more efficient transportation (compression) of the gas, condensate will be separated from the natural gas and stored in a 100 barrel storage tank and periodically loaded into a tank truck and shipped off-site. Two natural gas-fired compressor turbines rated at 10,311 horsepower each, and one compressor engine equipped with oxidation catalyst controls and rated at 4,735 horsepower will be used to transport the natural gas by pipeline from the compressor station to commerce. Air emissions will consist primarily of combustion products generated from firing natural gas in the turbines and reciprocating engine. Volatile organic compounds will be generated during loading operations from the condensate tank to tank trucks, flashing at the condensate tank, the blowdown vent, area releases of natural gas from possible miscellaneous engine/compressor vents and/or gas controlled valve operators, and fugitive emissions from equipment components. Additionally, minimal fugitive particulate emission will be generated by traveling on unpaved roads. The facility will also consist of a natural gas-fired emergency use backup generator engine rated at 838 horsepower.

The compressor station will be built on property adjacent to Gulf South Pipeline Company, LP's existing Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) permitted under permit no. 2160-00046-V1, issued August 11, 2006. The two compressor stations are contiguous facilities. The estimated emissions for NO<sub>x</sub> and CO from the contiguous Gulf South Pipeline Co - Sterlington Compressor Station (AI No. 3954) are 642.77 tpy and 999.87 tpy respectively which are above the PSD Major Source Levels (250 tpy). Therefore, the proposed Gulf Crossing Pipeline Co LLC - Sterlington Compressor

## PRELIMINARY DETERMINATION SUMMARY

**Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**

**Agency Interest No.: 151188**

**Gulf Crossing Pipeline Co LLC**

**Sterlington, Ouachita Parish, Louisiana**

**PSD-LA-729**

**March 31, 2008**

Station is considered a major stationary source in accordance with LAC 33:III.509. Any NSR regulated pollutants emitted above the *de minimis* levels as a result of the proposed construction project will be subject to a PSD review.

Estimated emissions, in tons per year, are as follows:

<u>Pollutant</u>	<u>Emissions</u>	<u>PSD de minimis</u>	<u>Review required?</u>
PM	6.48	25	No
PM <sub>10</sub>	6.48	15	No
SO <sub>2</sub>	2.44	40	No
NO <sub>x</sub>	72.65	40	Yes
CO	47.69	100	No
VOC	64.79	40	Yes

### IV. SOURCE IMPACT ANALYSIS

A proposed net increase in the emission rate of a regulated pollutant above de minimis levels for new major or modified major stationary sources requires review under Prevention of Significant Deterioration regulations, 40 CFR 52.21. PSD review entails the following analyses:

- A. A determination of the Best Available Control Technology (BACT);
- B. An analysis of the existing air quality and a determination of whether or not preconstruction or postconstruction monitoring will be required;
- C. An analysis of the source's impact on total air quality to ensure compliance with the National Ambient Air Quality Standards (NAAQS);
- D. An analysis of the PSD increment consumption;
- E. An analysis of the source related growth impacts;
- F. An analysis of source related growth impacts on soils, vegetation, and visibility;
- G. A Class I Area impact analysis; and
- H. An analysis of the impact of toxic compound emissions.

## PRELIMINARY DETERMINATION SUMMARY

### Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station

Agency Interest No.: 151188

Gulf Crossing Pipeline Co LLC

Sterlington, Ouachita Parish, Louisiana

PSD-LA-729

March 31, 2008

#### A. BEST AVAILABLE CONTROL TECHNOLOGY

Under current PSD regulations, an analysis of "top down" BACT is required for the control of each regulated pollutant emitted from a modified major stationary in excess of the specified significant emission rates. The top down approach to the BACT process involves determining the most stringent control technique available for a similar or identical source. If it can be shown that this level of control is infeasible based on technical, environmental, energy, and/or cost considerations, then it is rejected and the next most stringent level of control is determined and similarly evaluated. This process continues until a control level is arrived at which cannot be eliminated for any technical, environmental, or economic reason. A technically feasible control strategy is one that has been demonstrated to function efficiently on identical or similar processes. Additionally, BACT shall not result in emissions of any pollutant which would exceed any applicable standard under 40 CFR Parts 60 and 61.

For this project, BACT analyses are required for NO<sub>x</sub> and VOC emissions from the facility.

#### BACT analysis for NO<sub>x</sub>

Compressor Turbines (EQTs 1 and 2): The two 10,311 horsepower compressors are driven by natural gas fired turbines rated at 79.1 MM BTU/hr (maximum), and potential emissions are based on 100% operation for 8,760 hrs/yr. Based on a search of the EPA RACT/BACT/LAER Clearinghouse (RBLC), most current simple cycle gas fired turbines of approximately 10,311 horsepower utilize Dry Low NO<sub>x</sub> burners and good combustion practices as BACT. The proposed Solar Taurus 70-10302s turbine units will use Dry Low NO<sub>x</sub> burners. Good combustion practices include the use of natural gas as fuel for the turbines. For NO<sub>x</sub> emissions from each combustion turbine, the use of Dry Low NO<sub>x</sub> burners (vender guaranteed to meet 15 ppmvd NO<sub>x</sub> levels at 15% O<sub>2</sub> or 0.057 lb NO<sub>x</sub>/MM BTU) and good combustion practices including the use of natural gas as fuel are determined as BACT.

Compressor Engine (EQT 3): The 4,735 horsepower compressor is driven by a natural gas fired lean burn reciprocating internal combustion engine rated at 32.20 MM BTU/hr (maximum), and potential emissions are based on 100% operation for 8,760 hrs/yr. Based on a search of the RBLC, most current gas fired reciprocating internal combustion engines of approximately 4,735 horsepower utilize clean burning fuels and good combustion practices as BACT. The proposed Caterpillar 3616 engine unit employs clean burning fuels. Good combustion practices include the use of clean burning fuels such as natural gas as fuel for the engine. For NO<sub>x</sub> emissions from the combustion engine, the use of clean burning fuels and good combustion practices are determined as BACT.



## PRELIMINARY DETERMINATION SUMMARY

### Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station

Agency Interest No.: 151188

Gulf Crossing Pipeline Co LLC

Sterlington, Ouachita Parish, Louisiana

PSD-LA-729

March 31, 2008

Emergency Generator (EQT 4): This equipment will be operated 500 hours per year or less; and only during emergency situations, except that periodic use is expected for maintenance of the units. Based on a search of the RBLC, most current generators of similar size and duty utilize natural gas fuels and good combustion practices as BACT. For NO<sub>x</sub> emissions from the generator engine, the use of natural gas fuels and good combustion practices are determined as BACT.

#### **BACT analysis for VOC**

Compressor Turbines (EQTs 1 and 2): The two 10,311 horsepower compressors are driven by natural gas fired turbines rated at 79.1 MM BTU/hr (maximum), and potential emissions are based on 100% operation for 8,760 hrs/yr. Based on a search of the EPA RACT/BACT/LAER Clearinghouse (RBLC), most current simple cycle gas fired turbines of approximately 10,311 horsepower utilize good combustion practices as BACT. The two turbines have a potential to emit a total of 11.46 ton/yr each of VOC emissions. Since VOC emissions are low as a result of the composition of the natural gas, other add-on controls would be minimally effective and cost prohibitive. Good combustion practices including the use of clean burning fuels such as natural gas in the turbines are determined as BACT for VOC emissions.

Compressor Engine (EQT 3): The 4,735 horsepower compressor is driven by a natural gas fired lean burn reciprocating internal combustion engine rated at 32.20 MM BTU/hr (maximum), and potential emissions are based on 100% operation for 8,760 hrs/yr. Based on a search of the RBLC, most current gas fired reciprocating internal combustion engines of approximately 4,735 horsepower utilize good combustion practices as BACT. The proposed Caterpillar 3616 engine unit will use a catalytic oxidation with good combustion practices. The engine has a potential to emit a total of 8.07 ton/yr of VOC emissions. Catalytic oxidation and good combustion practices including the use of clean burning fuels such as natural gas in the engine are determined as BACT for VOC emissions.

Emergency Generator (EQT 4): This equipment will be operated 500 hours per year or less; and only during emergency situations, except that periodic use is expected for maintenance of the units. Based on a search of the RBLC, most current generators of similar size and duty utilize clean burning fuels and good combustion practices as BACT. Good combustion practices including the use of clean burning fuels such as natural gas in the engine are determined as BACT for VOC emissions.

Condensate Storage Tank (EQT 5): The VOC control technology evaluated for the use on the 100 barrel condensate storage tank is a submerged fill pipe. Based on a search of the RBLC, most current storage tanks of similar size and duty utilize a submerged fill pipe as BACT. Submerged fill pipe is determined as BACT for VOC emissions.

## PRELIMINARY DETERMINATION SUMMARY

### Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station

Agency Interest No.: 151188

Gulf Crossing Pipeline Co LLC

Sterlington, Ouachita Parish, Louisiana

PSD-LA-729

March 31, 2008

Truck Loading Rack (EQT 6): The VOC control technologies evaluated for the use on the truck loading rack are submerged loading and dedicated service. Based on a search of the RBLC, most loading racks of similar size and duty utilize submerged loading, dedicated service, and vapor recovery as BACT. Vapor recovery is not feasible due to the small amount of product transferred at this loading rack. Submerged loading and dedicated service are determined as BACT for VOC emissions.

#### **B. ANALYSIS OF EXISTING AIR QUALITY**

Prevention of Significant Deterioration regulations require an analysis of existing air quality for those pollutants to be emitted in significant amounts from a proposed facility. NO<sub>x</sub> and VOC are pollutants of concern in this case.

AERMOD modeling of NO<sub>x</sub> emissions from the proposed project indicates that the maximum offsite ground level concentrations of these pollutants will be below their respective PSD significance levels and preconstruction monitoring levels. Therefore, pre-construction monitoring, refined NAAQS modeling, and increment consumption analyses were not required.

#### **C. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) ANALYSIS**

Because AERMOD modeling analyses indicated concentrations of each pollutant would be below its PSD ambient significance level, refined NAAQS modeling was not required.

#### **D. PSD INCREMENT ANALYSIS**

Because AERMOD modeling analyses indicated concentrations of each pollutant would be below its PSD ambient significance level, PSD increment modeling was not required.

A summary of the air quality analyses is also presented in Table II.

#### **E. SOURCE RELATED GROWTH IMPACTS**

Operation of this facility is not expected to have any significant effect on residential growth or industrial/commercial development in the area of the facility. No significant net change in employment, population, or housing will be associated with the project. As a result, there will not be any significant increases in pollutant emissions indirectly associated with Gulf Crossing Pipeline Co LLC's proposal. Secondary growth effects will include temporary construction related jobs and approximately 2 permanent jobs.

## **PRELIMINARY DETERMINATION SUMMARY**

**Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**

**Agency Interest No.: 151188**

**Gulf Crossing Pipeline Co LLC**

**Sterlington, Ouachita Parish, Louisiana**

**PSD-LA-729**

**March 31, 2008**

### **F. SOILS, VEGETATION, AND VISIBILITY IMPACTS**

There will be no significant impact on area soils, vegetation, or visibility.

### **G. CLASS I AREA IMPACTS**

Arkansas' Caney Creek Wilderness Area, the nearest Class I area, is over 100 kilometers from the site, precluding any significant impact.

### **H. TOXIC EMISSIONS IMPACT**

The selection of control technology based on the BACT analysis did not include consideration of control of toxic emissions.

## **V. CONCLUSION**

The Air Permits Division has made a preliminary determination to approve the construction of the Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station near Sterlington, in Ouachita Parish, Louisiana, subject to the attached specific and general conditions. In the event of a discrepancy in the provisions found in the application and those in this Preliminary Determination Summary, the Preliminary Determination Summary shall prevail.

### SPECIFIC CONDITIONS

**Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**  
**Agency Interest No.: 151188**  
**Gulf Crossing Pipeline Co LLC**  
**Sterlington, Ouachita Parish, Louisiana**  
**PSD-LA-729**

1. The permittee is authorized to operate in conformity with the specifications submitted to the Louisiana Department of Environmental Quality (LDEQ) as analyzed in LDEQ's document entitled "Preliminary Determination Summary" dated March 31, 2008, and subject to the following emissions limitations and other specified conditions. Specifications submitted are contained in the application and Emission Inventory Questionnaire dated October 3, 2007, along with supplemental information dated March 26, 2008, which consolidated and certified previous additional information submittals.

MAXIMUM ALLOWABLE EMISSIONS RATES							
ID No.	Description		PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
EQT 1	C-1 Compressor Turbine No. 1	ppmvd	---	---	15 <sup>1</sup>	---	---
		lb/MM BTU	---	---	0.057	---	---
		lb/hr	0.52	0.27	4.50	4.57	2.62
		TPY	2.29	1.18	19.72	20.01	11.46
EQT 2	C-2 Compressor Turbine No. 2	ppmvd	---	---	15 <sup>1</sup>	---	---
		lb/MM BTU	---	---	0.057	---	---
		lb/hr	0.52	0.27	4.50	4.57	2.62
		TPY	2.29	1.18	19.72	20.01	11.46
EQT 3	C-3 Compressor Engine No. 1	lb/hr	0.32	0.02	7.31	1.57	1.84
		TPY	1.41	0.08	32.01	6.86	8.07
EQT 4	EG-1 Emergency Backup Generator	lb/hr	0.06	< 0.01	4.80	3.23	1.39
		TPY	0.02	< 0.01	1.20	0.81	0.35
EQT 5	T-1 Condensate Storage Tank	lb/hr	---	---	---	---	1.28
		TPY	---	---	---	---	5.62
EQT 6	L-1 Truck Loading	TPY	---	---	---	---	1.31
EQT 7	V-1 Blowdown Stack	TPY	---	---	---	---	6.29
EQT 8	V-2 Area Releases	lb/hr	---	---	---	---	1.22
		TPY	---	---	---	---	5.33
EQT 9	V-3 Turbine Starting Gas Vent	TPY	---	---	---	---	11.63
FUG 1	FUG-1 Piping Components (Fugitives)	lb/hr	---	---	---	---	0.75
		TPY	---	---	---	---	3.27
FUG 2	FUG-2 Unpaved Roads	lb/hr	0.11	---	---	---	---
		TPY	0.47	---	---	---	---
<sup>1</sup> @15% O <sub>2</sub>							

## **SPECIFIC CONDITIONS**

### **Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**

**Agency Interest No.: 151188**

**Gulf Crossing Pipeline Co LLC**

**Sterlington, Ouachita Parish, Louisiana**

**PSD-LA-729**

2. Compressor Turbines:  
use Dry Low NO<sub>x</sub> burner technology, employ good combustion practices including the use of natural gas as fuel, to limit NO<sub>x</sub> emissions to 0.057 lb/MM BTU.
3. Compressor Engine:  
use Catalytic Oxidation technology, employ good combustion practices including the use of natural gas as fuel.
4. Emergency Generator:  
equipment shall operate only during emergency situations except for periodic use required for testing and maintenance of the unit, employ good combustion practices including the use of natural gas as fuel.
5. Condensate Storage Tank:  
use submerged fill pipe technology.
6. Truck Loading Rack:  
use submerged loading technology and dedicated service.

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. *If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.*
  
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
  
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated October 3, 2007, along with supplemental information dated March 26, 2008.
  
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

*The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.*

*This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.*
  
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
  
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
  
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

approval from the Office of Environmental Assessment, Air Quality Assessment Division.

- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June
    - 3. Report by December 31 to cover July through September
    - 4. Report by March 31 to cover October through December
  - D. Each report submitted in accordance with this condition shall contain the following information:
    - 1. Description of noncomplying emission(s);
    - 2. Cause of noncompliance;
    - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
    - 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
  - E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be



## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY
2. Be less than the minimum emission rate (MER)
3. Be scheduled daily, weekly, monthly, etc., or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

TABLE I: BACT COST SUMMARY

**Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**  
**Agency Interest No.: 151188**  
**Gulf Crossing Pipeline Co LLC**  
**Sterlington, Ouachita Parish, Louisiana**  
**PSD-LA-729**

Control Alternatives	Availability/ Feasibility	Negative Impacts (a)	Control Efficiency	Emissions Reduction (TPY)	Capital Cost (\$)	Annualized Cost (\$)	Cost Effectiveness (\$/ton)	Notes
<b>C-1 Compressor Turbine No. 1 (EQT 1)</b>								
NO <sub>x</sub>	Yes/Yes	-	15 ppmvd	-	-	-	-	Selected
VOC	Yes/Yes	-	-	-	-	-	-	Selected
<b>C-2 Compressor Turbine No. 2 (EQT 2)</b>								
NO <sub>x</sub>	Yes/Yes	-	15 ppmvd	-	-	-	-	Selected
VOC	Yes/Yes	-	-	-	-	-	-	Selected
<b>C-3 Compressor Engine No. 1 (EQT 3)</b>								
NO <sub>x</sub>	Yes/Yes	-	-	-	-	-	-	Selected
VOC	Yes/Yes	-	-	-	-	-	-	Selected
<b>EG-1 Emergency Backup Generator (EQT4)</b>								
NO <sub>x</sub>	Yes/Yes	-	-	-	-	-	-	Selected
VOC	Yes/Yes	-	-	-	-	-	-	Selected

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 PSD-LA-729

<b>T-1 Condensate Storage Tank (EQT 5)</b>									
VOC	Submerged Fill Pipe	Yes/Yes	-	-	-	-	-	-	Selected
<b>L-1 Truck Loading (EQT 6)</b>									
VOC	Submerged Loading and Dedicated Service	Yes/Yes	-	-	-	-	-	-	Selected
Notes: a) Negative impacts: 1) economic, 2) environmental, 3) energy, 4) safety									

TABLE II: AIR QUALITY ANALYSIS SUMMARY

**Gulf Crossing Pipeline Co LLC - Sterlington Compressor Station**  
**Agency Interest No.: 151188**  
**Gulf Crossing Pipeline Co LLC**  
**Sterlington, Ouachita Parish, Louisiana**  
**PSD-LA-729**

Pollutant	Averaging Period	Preliminary Screening Concentration ( $\mu\text{g}/\text{m}^3$ )	Level of Significant Impact ( $\mu\text{g}/\text{m}^3$ )	Significant Monitoring Concentration ( $\mu\text{g}/\text{m}^3$ )	At the Monitoring Station		Background Concentration ( $\mu\text{g}/\text{m}^3$ )	Maximum Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Modeled + Background Concentration ( $\mu\text{g}/\text{m}^3$ )	NAAQS ( $\mu\text{g}/\text{m}^3$ )	Modeled PSD Increment Consumption ( $\mu\text{g}/\text{m}^3$ )	Allowable Class II PSD Increment ( $\mu\text{g}/\text{m}^3$ )
					Monitored Values ( $\mu\text{g}/\text{m}^3$ )	Modeling results ( $\mu\text{g}/\text{m}^3$ )						
PM <sub>10</sub>	24-hour	NR	5	10	NR	NR	NR	NR	NR	150	NR	30
	Annual	NR	1	-	NR	NR	NR	NR	NR	50	NR	17
SO <sub>2</sub>	3-hour	NR	25	-	NR	NR	NR	NR	NR	1300	NR	512
	24-hour	NR	5	13	NR	NR	NR	NR	NR	365	NR	91
NO <sub>x</sub>	Annual	NR	1	-	NR	NR	NR	NR	NR	80	NR	20
	Annual	0.87	1	14	NR	NR	NR	NR	NR	100	NR	25
CO	1-hour	NR	2000	-	NR	NR	NR	NR	NR	40,000	NR	-
	8-hour	NR	500	575	NR	NR	NR	NR	NR	10,000	NR	-
Lead	3-month	NR	-	0.1	NR	NR	NR	NR	NR	1.5	-	-
NR = Not required.												